

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LESTER LEE,
Plaintiff Pro Se

v. Case No. 8:24-cv-01205-ABA

BROOKSIDE PARK CONDOMINIUM, INC.,
METROPOLIS (aka MCM, INC.),
RAMMY AZOULAY, and
LAMONT SAVOY,
Defendants.

**DECLARATION OF LESTER LEE IN SUPPORT OF MOTION FOR
PROTECTIVE ORDER**

I, Lester Lee, hereby declare and state under penalty of perjury pursuant to 28 U.S.C.
§ 1746 as follows:

1. I am the Plaintiff in the above-captioned matter and make this declaration in support of my Motion for Protective Order.
2. I am proceeding pro se and am a disabled individual. I have been forced to act as my own attorney, paralegal, investigator, and researcher in this federal case.
3. Since the beginning of discovery, Defendants have jointly issued overlapping and duplicative interrogatories exceeding the numerical limits set by Rule 33(a)(1), forcing me to respond to more than 80 coordinated questions from three supposedly separate parties.

4. These interrogatories were not only excessive, but included irrelevant, invasive, and hostile questions regarding my disability, mental health, finances, housing status, and unrelated legal matters. They were clearly designed to provoke emotional distress and obstruct my ability to proceed.
5. Defendants have also coordinated the use of surveillance tactics, including a Ring camera and peephole camera aimed at my door, and provoked confrontations in an attempt to manufacture misconduct. These tactics have caused me anxiety, fear, and disrupted my ability to live peacefully in my home.
6. I believe these discovery efforts are retaliatory in nature and tied to my exercise of rights under the Fair Housing Act and Americans with Disabilities Act. The goal appears not to uncover facts, but to exhaust, discredit, and intimidate me into abandoning my case.
7. I respectfully request the Court issue a Protective Order to limit any further interrogatories, prohibit surveillance-based discovery, and prevent further attempts to invade my privacy or litigate this case through coercion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2025.

Lester Lee
Plaintiff Pro Se
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